

(JAB 8/5/08)  
SCANNED

ORIGINAL

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD)

Plaintiffs,

- against -

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

AE STORES, INC., et al.,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth L. Bressler, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

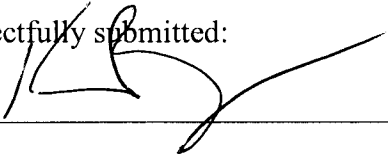
Timothy D. Pecsénye  
Blank Rome LLP  
One Logan Square,  
130 North 18<sup>th</sup> Street  
Philadelphia, PA 19103-6998  
Phone: (215) 569-5619  
Fax: (215) 569-5555  
Pecsénye@blankrome.com

Mr. Pecsénye is a member in good standing of Bars of the State of New Jersey and the Commonwealth of Pennsylvania.

There are no pending disciplinary proceedings against Mr. Pecsénye in any State or Federal Court.

Dated: August 1, 2008  
City, State: New York, New York

Respectfully submitted:



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Kenneth L. Bressler (KB-  
3389)  
Blank Rome LLP  
The Chrysler Building,  
405 Lexington Avenue  
New York, NY 10174-0208  
Phone: (212) 885-5245  
Fax: (212) 885-5001

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD)

Plaintiffs,

- against -

AE STORES, INC., et al.,

Defendants.

**AFFIDAVIT OF  
KENNETH L. BRESSLER  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

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STATE OF NEW YORK                    )  
  )     ss.  
COUNTY OF NEW YORK            )

KENNETH L. BRESSLER, being duly sworn, hereby deposes and says as follows:

1. I am a member of Blank Rome LLP, counsel for defendant Forman Mills, Inc. ("Forman Mills") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of motion of Forman Mills to admit Timothy D. Pecsénye as counsel *pro hac vice* to represent Forman Mills in this matter.

2. I am a member in good standing of the bar of the State of New York. Additionally, I am admitted to practice before, and am in good standing with the United States Courts of Appeals for the Federal, Second and Tenth Circuits; the United States District Court for the Southern District of New York; the United States District Court for the Eastern District of New York; and the United States District Court for the Western District of New York.

3. I have known Mr. Pecsénye since 2005.

4. Mr. Pecsénye is a partner at Blank Rome LLP in Philadelphia, Pennsylvania.

5. I have found Mr. Pecsénye to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Timothy D. Pecsénye, *pro hac vice*.

7. I respectfully submit herewith a proposed order granting the admission of Timothy D. Pecsénye, *pro hac vice*.

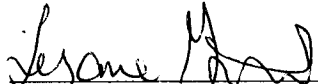
WHEREFORE, it is respectfully requested that the motion to admit Timothy D. Pecsénye, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Respectfully submitted,

  
Kenneth L. Bressler

SDNY Bar Code: KB-3389

Sworn to before me this  
1 day of August 2008



Notary Public

**LESCENE GIBBONS**  
Notary Public, State of New York  
No. 01GI6044509  
Qualified in New York County  
Commission Expires July 10, 20 10

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	)	
CHRISTIAN CASEY LLC, et al.,	)	08-CV-00870 (GBD)
	)	
Plaintiffs,	)	
	)	
- against -	)	
	)	
AE STORES, INC., et al.,	)	
	)	
Defendants.	)	
-----	X	

**AFFIDAVIT OF TIMOTHY D. PECSENYE IN  
SUPPORT OF APPLICATION FOR ADMISSION  
TO THIS COURT PRO HAC VICE**

STATE OF PENNSYLVANIA     ):  
  ):     s.s.:  
COUNTY OF PHILADELPHIA     ):

TIMOTHY D. PECSENYE, being duly sworn, deposes and says:

1. I submit this affidavit in support of the motion for admission to this Court in the above-captioned case, *pro hac vice*. This affidavit is based upon my personal knowledge.

2. I reside at 409 South 18<sup>th</sup> Street, Philadelphia, PA 19146. I am a partner of the law firm of Blank Rome LLP ("Blank Rome"), with offices for the practice of law at, among other places, One Logan Square, Philadelphia, Pennsylvania 19103. Blank Rome also has a New York office located at 405 Lexington Avenue, New York, NY 10174.

3. I was admitted to the Commonwealth of Pennsylvania, (all Courts) in 1987. As shown in the Certificate of Good Standing attached hereto, I am an active member in good standing of the bar of the Commonwealth of Pennsylvania. I am also an active member in good standing of the following federal courts: the United States District Courts for the Eastern and

Western Districts of Pennsylvania, the United States District Court of Colorado, and the United States Court of Appeals for the Third Circuit and Federal Circuit.

4. I hereby request that I be admitted to this Court for the purpose of representing defendants in connection with the above-captioned case, *pro hac vice*. I intend to act as trial counsel in connection with this action.

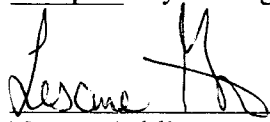
5. There are no pending disciplinary proceedings against me in any State or Federal court.

6. I recognize that if I am admitted *pro hac vice* I will be within the disciplinary jurisdiction of this court, and I will abide by all of the rules applicable to practice in this jurisdiction.

**WHEREFORE**, it is respectfully requested that I be permitted to appear before this Court in connection with the trial of this action, including all pre-trial and post-trial proceedings.

  
TIMOTHY D. FECSENYE

Sworn to before me this  
1 day of August, 2008.

  
Notary Public

LESCENE GIBBONS  
Notary Public, State of New York  
No. 01GI6044509  
Qualified in New York County  
Commission Expires July 10, 2010



Supreme Court of Pennsylvania

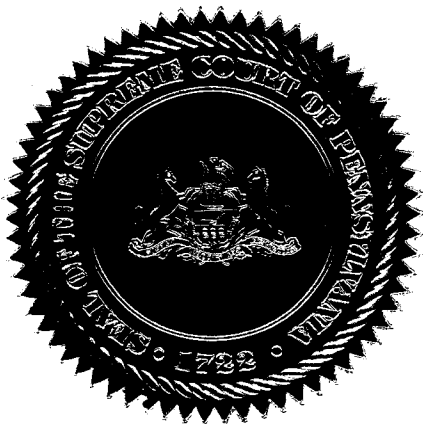
**CERTIFICATE OF GOOD STANDING**

***Timothy D. Pecsenty, Esq.***

**DATE OF ADMISSION**

***December 17, 1987***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: July 25, 2008**

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD)

Plaintiffs,

- against -

**ORDER FOR ADMISSION  
PRO HAC VICE**

AE STORES, INC., et al.,

Defendants.

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Upon the motion of Kenneth L. Bressler, attorney for defendant Forman Mills, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Timothy D. Pecsénye  
Blank Rome LLP  
One Logan Square,  
130 North 18<sup>th</sup> Street  
Philadelphia, PA 19103-6998  
Phone: (215) 569-5619  
Fax: (215) 569-5555  
Pecsénye@blankrome.com

is admitted to practice *pro hac vice* as counsel for defendant Forman Mills, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys.



If this action is assigned to the (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2008  
New York, New York

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United States District/Magistrate Judge

**AFFIDAVIT OF SERVICE**

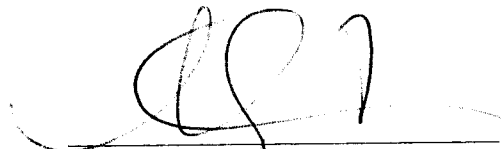
STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

Nikki Covington, being duly sworn, deposes and says that she is over the age of eighteen (18) years and is not a party to this action; that on the 1st day of August 2008, served the within **MOTION TO ADMIT COUNSEL *PRO HAC VICE***, by depositing a true copies thereof enclosed in post-paid wrappers, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the following persons at the last known address set forth after their names:

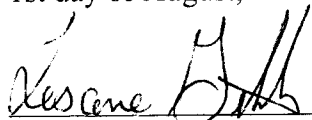
Stephen M. Roseman  
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(516) 327-4600

Kenneth R. Schacter, Esq.  
Silverberg Stonehill Goldsmith & Haber P.C.  
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New York, NY 10018  
(212) 730-1900

Brent H. Blakely, Esq.  
Blakely Law Group  
915 North Citrus Avenue  
Hollywood, CA 90038  
(323) 464-7400

  
\_\_\_\_\_  
Nikki Covington

Sworn to before me this  
1st day of August, 2008

  
\_\_\_\_\_  
Notary Public

**LESCENE GIBBONS**  
Notary Public, State of New York  
No. 01GI6044509  
Qualified in New York County  
Commission Expires July 10, 20 10